

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	Case No. 19-cr-00833 (SHS)
UNITED STATES OF AMERICA,	:	
	:	
	:	<u>NOTICE OF MOTION</u>
-v.-	:	
	:	<u>ORAL ARGUMENT</u>
ANTHONY CHEEDIE, <i>et al.</i> ,	:	<u>REQUESTED</u>
	:	
Defendants.	:	
	:	
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PLEASE TAKE NOTICE that defendant Cameron Brewster hereby moves for an order (a) compelling the government, pursuant to Fed. R. Crim. P. 7(f), to provide a bill of particulars; (b) suppressing evidence derived from the execution of search warrants issued based on false, misleading, and erroneous information which was knowingly and deliberately misrepresented (or at least delivered with reckless disregard for the truth of the available evidence and information obtained), in violation of the Fourth Amendment of the United States Constitution; (c) suppressing any and all recorded telephone calls involving Mr. Brewster and CW-3 or any other informant or, in the alternative, for an order that the government produce all discovery concerning the circumstances of these calls and to conduct an evidentiary hearing to determine whether these calls were lawfully secured or should otherwise be excluded pursuant to the Fourth Amendment of the United States Constitution; (d) compelling the government to immediately produce exculpatory material to which he is entitled pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), as well as *Giglio* and Jencks Act material and under the Fifth and Sixth Amendments of the United States Constitution; (e) compelling the disclosure of grand jury testimony pursuant to Rule 6(3)(E)(ii) of the Federal Rules of Criminal Procedure; (f) for leave to file additional and

supplemental motions and to join in motions filed by his co-defendants; and (g) for such other, further and different relief as this Court may deem just, equitable and proper. The Court set October 13, 2020 as the deadline for filing defendant Cameron Brewster's moving papers, and October 27, 2020 as the deadline for the filing of the government's answering papers, and November 10, 2020 as the deadline for the filing defendant Cameron Brewster's reply brief. The Court will conduct a status conference on December 14, 2020 at 2:30 p.m at the U.S. Courthouse, 500 Pearl Street, New York, New York, in Courtroom 23A.

Dated: New York, New York
October 13, 2020

By: /s/ Ryan P. Poscablo
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